

Transcript of the Testimony of

MARIAN BROOKE HENDERSON

May 18, 2022

Henderson vs School District of Springfield, R-12

6:21-CV-03219



Alpha Reporting & Video
1911 S. National Ave., Suite 405
Springfield, MO 65804
Phone: 417-887-4110

transcripts@alphareportingservice.com
www.alphareportingservice.com

1 beliefs upon a student and that those rights belong
2 to the parent. If a student knows what political
3 party I'm in, I'm not doing a good job.

4 Q. And are you saying that those topics came up during
5 the fall 2020 districtwide equity training?

6 A. Yes.

7 Q. So that would have been for you on October 14, 2020?

8 A. Yes.

9 Q. And you took that training virtually?

10 A. Yes.

11 Q. And at the time, most of the people in that
12 training -- was everybody in that training virtual?
13 Was it a totally virtual training for that group of
14 people?

15 A. Yes.

16 Q. And the people that were in that training were
17 primarily -- were they all from the special services
18 department?

19 A. No.

20 Q. Did you know most of them?

21 A. Yes.

22 Q. So who was it at the meeting that said that about
23 socialism? Who was that?

24 A. Yvania Garcia-Pusateri.

25 Q. Okay. Did anyone else talk about socialism?

1 cover other different training that you were given?

2 ALICE training -- are you familiar with ALICE
3 training?

4 A. I am.

5 Q. And you took that in 2020?

6 A. Yes, I did.

7 Q. And as a part of that, you received additional money
8 above and beyond what your salary would have been.
9 Did you know that?

10 A. Yes.

11 Q. So what's this 25 modules for each staff member to
12 complete? Is that correct?

13 A. Can you define "modules."

14 Q. That's in your complaint. So I'm assuming that
15 that's something you knew.

16 A. Within the Canvas training, I believe that you
17 referred to three modules. So I think it's a matter
18 of words, but there were approximately 25 different
19 lessons or slides within Canvas.

20 Q. Well, let's talk about what you actually did, then,
21 during 2020-'21. Is it correct that you accessed
22 some equity and diversity Canvas modules?

23 A. Yes.

24 Q. And the Canvas modules you accessed were -- how many
25 did you access?

1 A. I believe there were a couple of modules -- within
2 that module there were separate other modules --
3 components which is what I'm referring to as the
4 modules.

5 Q. So would there have been one for elementary and one
6 for secondary?

7 A. Yes.

8 Q. Okay. Those would be the primary two modules that
9 you're talking about?

10 A. No.

11 Q. Okay. What were the two?

12 A. So one would have been cultural consciousness.

13 Q. Okay.

14 A. And another one would have been -- I think it was
15 titled maybe racial injustice -- social and emotional
16 learning through an equity lens.

17 Q. Actually, did you access overview of social and
18 emotional learning from an equity lens?

19 A. Yes.

20 Q. And did you access elementary social and emotional
21 learning as it relates to racial injustice?

22 A. Yes.

23 Q. Did you access secondary social and emotional
24 learning as it relates to racial injustice?

25 A. Yes.

1 Q. And did you access elementary social and emotional
2 learning as it relates to COVID-19?

3 A. Yes.

4 Q. And did you access secondary social and emotional
5 learning as it relates to COVID-19?

6 A. Yes.

7 Q. Were there any other Canvas modules that you accessed
8 during the school year '20-'21 that were placed on
9 there by the district's office of equity and
10 diversity?

11 A. Not that I recall.

12 Q. Okay. Did you complete all of these Canvas modules
13 during the school year '20-'21 that I just mentioned?

14 A. Yes.

15 Q. And I think you mentioned earlier that you
16 encountered problems with the Canvas modules in
17 '20-'21 -- these five Canvas modules. Do you
18 remember what those problems were?

19 A. Yes.

20 Q. And what were they?

21 A. When you had to complete the module, there was a
22 final reflection page, and I couldn't access that one
23 page. And that was the final to sign off on
24 completing the entire module.

25 Q. All right. And is this when you went to

1 Q. And, again, during 2020-'21, you've told me all of
2 the Canvas modules you accessed that were prepared by
3 the office of equity and diversity that you're
4 complaining about in this lawsuit?

5 A. Yes. In this lawsuit, yes.

6 Q. In 2021-'22, have you accessed any Canvas modules
7 that were placed there by the office of equity and
8 diversity?

9 A. No.

10 Q. Have you been asked to do that?

11 A. No.

12 Q. In Paragraph 98 of the complaint, you state that "If
13 staff did not complete the modules, they were told
14 they would not receive credit and their pay would be
15 docked." Who told you that?

16 A. The E-mails from Yvania stated that we would not
17 receive credit. Our directors of my department
18 stated in process coordinator meetings that we would
19 not receive credit and that they were mandatory.

20 Q. All right. They were mandatory to take those five
21 modules?

22 A. Yes.

23 Q. And you did that?

24 A. Yes, sir.

25 Q. And you completed them?

1 A. Yes, sir.

2 Q. And you got credit?

3 A. Yes, sir.

4 Q. And you got all the money that you were supposed to

5 get?

6 A. I didn't get paid additional.

7 Q. Well --

8 A. Yes, my pay was not docked.

9 Q. Right.

10 A. Yes, sir.

11 Q. Okay. I think there's a difference of opinion with

12 respect to this money and how it went in. I'll say

13 school districts historically give money and then

14 dock it for whatever reason if you don't comply with

15 whatever the rules are.

16 A. Yes.

17 Q. But I'm not frankly -- okay. It doesn't matter.

18 A. Okay.

19 Q. As far as you know, you received all the money you

20 were supposed to get?

21 A. Yes, sir.

22 Q. Okay. So the only person that you mentioned, you

23 mentioned Dr. Garcia-Pusateri told you that you had

24 to -- in a written document that you had to complete

25 the Canvas modules or you would not receive credit;

1 Q. Yes.

2 A. No.

3 Q. All right. Let's talk about the October 14, 2020,
4 training just a little bit more. Exhibit 13.02 has a
5 list of the employees that signed up for the training
6 that you took on October 14, 2020.

7 MR. ELLIS: Can you show her that.

8 Q. (By Mr. Ellis) Do you see your signature on there?

9 A. Yes.

10 Q. And you must have signed that at some other time.

11 How did you go about signing that because you were
12 virtual?

13 A. They sent an E-mail to Dave Whitson. I believe it
14 came from LA Anderson to Dave Whitson and asked if
15 he'd collect signatures because he was not able to
16 capture the signatures of people that were attending
17 in the Zoom training. So we had to sign after the
18 training.

19 Q. Okay. And so the people that are listed on there, it
20 looked to me like they were mostly special services
21 department people with a scatter of some other
22 people?

23 A. Yes.

24 Q. Those would be people that you work with?

25 A. Yes.

1 Q. Is there anything about the introduction that
2 bothered you that you're complaining about?
3 A. That we had to agree or we would lose credit and that
4 we had to be an ally and it was part of our job duty
5 to be an antiracist educator.
6 Q. And who said that?
7 A. I believe it was Yvania Garcia-Pusateri.
8 Q. And that was in the introduction?
9 A. Yes.
10 Q. Were you told that you had to keep your camera on?
11 A. Not in the introduction.
12 Q. Okay. During the meeting, were you told to keep your
13 camera on?
14 A. Yes.
15 Q. Did they say why?
16 A. Yes. Because some people in our -- yes.
17 Q. No. Go ahead.
18 A. Because some people in our training didn't have
19 access to cameras on their computer. And they said
20 it was disrespectful if we didn't have our cameras
21 on, but not everybody had access to a camera.
22 Q. Okay. But you did?
23 A. I did, yes.
24 Q. And you were having difficulty with your camera that
25 day; is that correct?

1 already said.

2 A. Okay. At the beginning?

3 Q. Yeah.

4 A. That we would be sent out to Zoom groups. Within
5 that Zoom group, we had to have conversations within
6 our group that we would be required to answer when we
7 came back to the larger group. LA Anderson stated
8 that he wasn't afraid to call on people if they did
9 not answer.

10 Q. Okay. Did he ever call on you?

11 A. No.

12 Q. Did he ever call on anybody?

13 A. Yes.

14 Q. Did some people respond to whatever he was asking?

15 A. Yes.

16 Q. Did some people not respond?

17 A. No.

18 Q. Or respond "I don't have an opinion"?

19 A. No.

20 Q. So everybody had an opinion?

21 A. Everybody had an opinion.

22 Q. Okay. When you're sitting there in the
23 Bentley Building virtual with the October 14, 2020,
24 program, how many people could you see on your
25 monitor?

1 Q. Okay. What was that in the context of? Did she say?

2 A. That would have been in the original instructions.

3 Q. Okay.

4 A. And, again, when they discussed making sure that our

5 cameras were turned on.

6 Q. Okay. Do you know anybody that attended this

7 meeting -- attended this training who did not get all

8 the credit?

9 A. No.

10 Q. Do you know anybody that attended this meeting who

11 got kicked out?

12 A. No.

13 Q. In any of the other equity training programs -- have

14 you attended any other equity training programs for

15 the district? I think we've covered this. The

16 answer's no?

17 A. Correct. No.

18 Q. In Paragraph 77 you say "Staff were instructed to

19 show they were participating by always keeping their

20 cameras on." And you said that was also

21 Dr. Garcia-Pusateri?

22 A. And Dr. Anderson -- or LA Anderson. I don't think

23 it's --

24 Q. He'll be happy to know that you called him a doctor.

25 Maybe not. I don't know.

1 training; right?

2 A. Yes.

3 Q. All right. Let's talk about the George Floyd video.

4 Would it be essentially correct to state that the

5 George Floyd video was a several minute video --

6 somebody can probably tell me how many minutes

7 here -- but several minutes of video that had very

8 little content in it?

9 A. Yes.

10 Q. It was mostly video and not audio?

11 A. With words on a screen, yes.

12 Q. "I can't breathe"?

13 A. Yes.

14 Q. Did you watch that video?

15 A. Yes.

16 Q. Did anyone call on you or direct you individually to

17 watch that video? Were you told it was going to come

18 on and that you needed to watch it?

19 A. Yes.

20 Q. And who was that?

21 A. I believe it was Yvania.

22 Q. One of these days you might change your story; so I

23 need to know who that was. What did she say about

24 it?

25 A. That it was going to be difficult to watch, but we

1 screen. But they sent us to a small group, and we
2 had to discuss what we saw in the video.
3 Q. Okay. But I'm talking about while the video is
4 running.
5 A. Oh, no.
6 Q. So while the video is running, all you can see is the
7 video?
8 A. Yes. I believe that's correct, yes.
9 Q. Did you have a line of people down the side of your
10 screen, or was your screen completely filled with the
11 video?
12 A. I believe the screen was completely filled with the
13 video.
14 Q. By being asked to watch that video, do you consider
15 that to be a violation of your rights?
16 MR. BOUCEK: Object to the form.
17 Q. (By Mr. Ellis) You can answer if you know.
18 A. By watching the video?
19 Q. Yeah, by being asked to watch the video.
20 MR. BOUCEK: Objection to form.
21 A. No.
22 Q. (By Mr. Ellis) Did you understand the question?
23 A. Yes.
24 Q. Did you have a breakout session after the
25 George Floyd video?

1 A. Yes.

2 Q. So why don't you tell me again what you said.

3 A. That I felt that the video was taken out of context
4 and it was only reflecting one side of the incident
5 by removing all the other -- all the other context.
6 So they removed all the other language out of that
7 and just put that in isolation.

8 Q. All right. Did anyone else offer different
9 statements about it in your breakout?

10 A. No.

11 Q. So there were people that had no opinion and made no
12 statements?

13 A. In my breakout session, as I recall, the people that
14 spoke agreed that it was hard to make any
15 determination out of context.

16 Q. Was anything else said about the video during that
17 breakout session by the people in your meeting?

18 A. We had to discuss how it made us feel watching it.

19 Q. Okay. Did you discuss how it made you feel?

20 A. Yes.

21 Q. And what did you say?

22 A. It made me feel bad but that, again, just watching it
23 in that one setting, you feel bad. I wasn't in the
24 setting when it happened, and so just seeing it from
25 that aspect made me feel bad but that I wish that

1 A. Yes.

2 Q. Still is?

3 A. Yes.

4 Q. So you came -- then you zoomed back into the big

5 meeting. And what was the next thing that happened?

6 Was it the oppression matrix discussion?

7 A. We had a large group discussion.

8 Q. Oh, about the video?

9 A. Yes.

10 Q. Were you asked to provide any information during that

11 discussion?

12 A. Not by name, no.

13 Q. Did you provide information?

14 A. No.

15 Q. Did other people provide information?

16 A. Yes.

17 Q. All right. What do you remember?

18 A. That LA Anderson said that he was calling on

19 individual Zoom groups and that he wanted a person

20 from each group to state how our breakout group

21 collectively -- what were the thoughts of our group

22 and what was discussed within our group.

23 Q. And who got tapped for that?

24 A. I don't recall the specific people.

25 Q. But somebody summarized everything that was said?

1 A. Yes.

2 Q. And did they summarize what you said?

3 A. I don't recall specifically what they said.

4 Q. Were you offended by it in any way, what was said? I

5 mean, do you have that recollection of being, wow, I

6 didn't like what they said about me; or they didn't

7 identify you, but I didn't like what our person said?

8 A. I don't recall that. No, I don't recall that they --

9 Q. So did some groups not respond? Did every group

10 respond?

11 A. Every group that was called on responded.

12 Q. And how did LA call on them?

13 A. By the --

14 Q. The group number?

15 A. Uh-huh.

16 Q. You're like number one, number two, whatever it was?

17 A. Correct.

18 Q. About how long was that breakout session?

19 A. The breakout session?

20 Q. My bad. About how long was the full session with the

21 discussion about what the breakout sessions --

22 A. Several minutes. I don't have a specific time.

23 Q. What was the next topic that was discussed in that

24 meeting? Was it the oppression matrix?

25 A. I don't --

1 Q. You don't remember?

2 A. I don't remember the exact format.

3 Q. Well, let's just do it this way. You allege that you
4 were asked to identify where you fell on the
5 oppression matrix?

6 A. Yes.

7 Q. And you had a separate copy of the oppression matrix;
8 right?

9 A. Yes.

10 Q. I mean, that was one of the documents you got from
11 Phil Hale?

12 A. Yes.

13 Q. So were you asked to fill it out?

14 A. No.

15 Q. I mean, you were just asked to look at it? Isn't
16 it -- what were you asked to do?

17 A. We were asked to identify in which category that we
18 fell in on that oppression matrix and that we can
19 identify with more than one category. And so we had
20 to identify with it, and then we had to reflect on
21 it, and then we had a conversation in small groups.

22 Q. So you looked at it first. Then you went to a small
23 group to the breakout session, had a discussion about
24 it, and then came back to a full group discussion?

25 A. Yes.

1 we belonged to. It wasn't a rating.

2 Q. And how would you tell the others what group you were
3 in?

4 A. Well --

5 Q. I mean, some of them are obvious.

6 A. I was going to say some of them are really obvious.

7 Q. Maybe they're not. I don't know.

8 A. And how did we feel about being assigned to those,
9 how did we feel about that. And, you know, it was a
10 reflection on where we fell in recognizing that we
11 had -- some people had more privileges than other
12 people just by being born into them.

13 Q. Or deciding that you are in it even if you're not?
14 I'm sorry. That's a side comment.

15 Okay. So did everyone -- was there like a big
16 reveal here in the breakout session with everybody
17 saying, well, I'm a this and I'm a that and I'm not
18 that? I mean, did everybody reveal where they were
19 on that chart?

20 A. I don't recall.

21 Q. And you don't remember having to do that?

22 A. I don't remember what the conversation -- the
23 specific conversation was.

24 Q. That's what I'm trying to get at.

25 A. Yeah.

1 Q. You know, what you were asked to do. And so you were
2 actually discussing these things one at a time, it
3 sounds like?

4 A. Yes.

5 Q. Was there anybody in your breakout session that
6 didn't want to discuss this?

7 A. Yes.

8 Q. And who would that be?

9 A. I don't recall. This was -- I don't recall.

10 Q. Okay. Did you have trouble discussing it?

11 A. Yes.

12 Q. Can you generally tell me what your problem was with
13 discussing these issues? I'm not asking you
14 specifically what you put down. Just generally tell
15 me what your concerns were.

16 A. That I had to automatically admit or affirm that I
17 had white privilege; that if I was white and I
18 wasn't -- if I was white and I was this gender, then
19 I had additional privileges. If I was white and I
20 was this gender and I fell into a certain age group,
21 then I had even more privilege. Are you asking me
22 specifically what I objected to?

23 Q. Yes, whatever you'll tell me.

24 A. Yes. I objected to being told that, if I was white,
25 I could not say that I was an antiracist; that as an

1 educator and as a parent, that I might be oppressive
2 to children or to my children or even to elderly
3 people. My parents would fall into that elderly
4 category, and I am very respectful to my parents.
5 And just because I was born one way doesn't make me
6 any more privileged than another person.

7 Q. Did you express that opinion in the meeting?

8 A. No.

9 Q. So you just said what you had to say and didn't say
10 what you didn't want to say?

11 A. Yes, sir.

12 Q. It must have been a short conference if everybody was
13 the same way.

14 A. It was a --

15 Q. That's not a fair statement. That's not a fair
16 question. What I'm saying is it seems like you may
17 not have said very much?

18 A. Correct.

19 Q. And did you even share where you set yourself on the
20 form?

21 A. I don't recall that I did, no.

22 Q. And you didn't remember anybody that -- you didn't
23 really remember what other people said?

24 A. No.

25 Q. Okay. So you're back in the full room. What happens

1 next?

2 A. They asked if anybody cared to share their feelings
3 on the matrix.

4 Q. Did people share their opinions?

5 A. I --

6 Q. Their feelings, I think is what you said.

7 A. Yeah, their feelings. Not that I recall, no.

8 Q. Okay. So they were met with loud silence?

9 A. Yes, sir.

10 Q. And from your statement, I assume that -- well, let
11 me just ask. It would appear that you made no
12 statement about where you fell on the oppression
13 matrix?

14 A. I don't recall specific statements, no.

15 Q. Okay. Did anybody -- did any of the presenters call
16 anyone out?

17 A. I don't recall in this particular slide.

18 Q. Okay. Did any of the presenters do what they did in
19 the previous slide where they called on a group --
20 have a group member give a summary of the
21 conversation?

22 A. I don't recall on this specific slide.

23 Q. Okay. That's fine. The next item that is in the
24 complaint is the covert and overt white supremacy
25 chart?

1 A. Yes.

2 Q. Tell me how this chart was handled in the -- I mean,
3 is it the same format? You have a discussion. Then
4 you go to a breakout room in a small group. Then you
5 come back to a full group. Or was it something
6 different?

7 A. This, to the best of my recollection, was a full
8 group and -- a full group.

9 Q. Okay. So you never broke out?

10 A. Not that I recall.

11 Q. Tell me who led this discussion. What presenter?

12 A. Dr. Yvania Garcia-Pusateri.

13 Q. What did she say about it?

14 A. She said that we might not all be familiar with these
15 terms on this covert/overt white supremacy chart.
16 She discussed specifically what overt white supremacy
17 meant. And then she said we're all very familiar
18 with overt white supremacy, but we may not -- people
19 may not be as familiar with other ways that they can
20 fall into the white supremacist category. She
21 specifically talked about the BIPOC Halloween
22 costumes, tokenism, the white savior complex,
23 color-blind. She talked about the English-only
24 initiatives. And those are the ones that she -- and,
25 again, the education funding from the property tax.

1 Those were the main ones.

2 COURT REPORTER: I'm sorry. What kind of
3 Halloween costumes did you say?

4 A. B-I-P-O-C.

5 Q. (By Mr. Ellis) Why don't you tell me what that means.

6 A. Being a person of another culture.

7 Q. Good to know. So did this chart -- I mean, this is
8 in a couple of different ways. It's the pyramid?

9 A. Yes.

10 Q. And you also had the side-by-side?

11 A. Yes.

12 Q. There was nothing you had to do. It was just a
13 discussion about the types of white supremacy?

14 A. Yes, they did ask for responses to any of the terms
15 on there. They asked if we were familiar with all
16 the terms and if there were terms that we weren't
17 familiar with.

18 Q. Did you ask questions?

19 A. Yes.

20 Q. All right. What was your question?

21 A. I asked the question about the BIPOC Halloween
22 costume.

23 Q. Thank you. I wasn't the only one that didn't know.
24 And what was their definition of that?

25 A. That if you dress up as another culture for

1 Halloween -- as somebody from another culture for
2 Halloween, that it was considered a form of white
3 supremacy.

4 Q. Okay. Were you asked any questions -- other than you
5 asked that question, were you asked to provide any
6 information?

7 A. No.

8 Q. Was there anything about being -- I mean, they
9 asked -- it was a general call does anybody have a
10 question about definitions kind of?

11 A. Correct.

12 Q. And you responded. Was there anything about that
13 back-and-forth discussion that you considered to be a
14 violation of your rights?

15 MR. BOUCEK: Object to the form

16 Q. (By Mr. Ellis) You may answer.

17 A. I felt that -- a violation of my constitutional
18 rights by having a conversation?

19 Q. Yeah, by being asked what your question was.

20 A. No.

21 Q. The discussion that was had, did you have a concern
22 that that violated your rights --

23 MR. BOUCEK: Object to the form.

24 Q. (By Mr. Ellis) -- about the discussion about
25 covert/overt and white supremacy?

1 MR. BOUCEK: Object to the form.

2 A. Yes.

3 Q. (By Mr. Ellis) And what was it you did not like about
4 that?

5 A. I don't agree with many of the statements that are on
6 there. Specifically I don't affirm to the fact that,
7 if we are color-blind, that we're racist; if we see
8 every human as a human being instead of specifically
9 looking at each person as a color, that we're racist.
10 I also disagreed with the conversation about the
11 Halloween costumes.

12 MR. ELLIS: Off the record.

13 (Discussion off record.)

14 Q. (By Mr. Ellis) Social identities chart -- was that
15 next?

16 A. To the best of my recollection, yes. In some order
17 on there, yes.

18 Q. Tell me about the social identities chart. What were
19 you asked to do?

20 A. We were asked to locate ourselves within the circle
21 of the social identities, and we had to put ourselves
22 into each of the categories. So we had to answer
23 those questions that were in that center box and then
24 put ourselves in the different categories of social
25 identities.

1 Q. All right. Did you fill this one out?

2 A. No.

3 Q. Were you asked to?

4 A. We were on Zoom --

5 Q. Let me get the context of how this discussion

6 happened. At some point in time during the training,

7 you came to the part where they wanted to discuss the

8 social identities chart?

9 A. Yes.

10 Q. And I think the social identities chart is set forth

11 on Paragraph 72?

12 A. Yes, sir.

13 Q. And so did they ask you to fill out the social

14 identities chart?

15 A. Yes.

16 Q. And who was that? Yvania?

17 A. I don't recall who asked us to fill that out.

18 Q. One of the presenters?

19 A. One of the presenters, yes.

20 Q. Okay. And so you could choose to do it or not do it,

21 and you chose not to do it?

22 A. Yes.

23 Q. Was there a breakout session?

24 A. I don't recall specifically.

25 Q. Okay. Was there a large group discussion about it?

1 A. Yes.

2 Q. Who led that?

3 A. I don't recall if that was LA or Yvania.

4 Q. Do you remember anything that was said during that
5 large group discussion?

6 A. I do. They actually referred us back to the
7 2019-2020 training that had somewhat similar social
8 identities charts. And I believe it was LA that led
9 this part of the discussion because he was the
10 trainer for 2019-2020. In that we talked about how
11 people's social identities can change over time and
12 that we needed to rate ourselves for where we -- look
13 at where we were and look at where we currently are
14 and how our identities are very fluid and they can be
15 shaped.

16 Q. Okay. Were you asked specifically to say anything
17 during that part of the meeting?

18 A. No.

19 Q. Did you offer anything without being asked?

20 A. No.

21 Q. Were there other people that didn't speak?

22 A. Yes.

23 Q. Or was this just basically a lecture thing? Do you
24 understand what I'm saying?

25 A. Yes, I do.

1 Q. They're talking about it and discussing it but don't
2 ask any questions?

3 A. I believe that they did ask people to share where
4 they fell on the identity chart, yes.

5 Q. Did people agree to do that or not agree to do that?
6 What happened? What was the mix?

7 A. Some people, as far as I recall, did agree. People
8 participated. I don't know if they -- I can't say if
9 they agreed or disagreed, but I believe -- they
10 provided participation.

11 Q. But you weren't asked?

12 A. I was not asked specifically, no.

13 Q. Okay. Were there any other small or large group
14 discussions that we haven't discussed?

15 A. The four corners.

16 Q. Okay. Let's talk about the four corners. What was
17 that? Is that the one with the goldfish?

18 A. Yes.

19 Q. With a fin?

20 A. Yes.

21 Q. Tell me about the four corners. What is that about?

22 A. They read a series of statements, and we had to hold
23 up our -- this is where we had to hold up our
24 agree/disagree signs. There was a series of
25 statements.